

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

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In re: Lindell Management LLC Litigation

Case No. 23-cv-1433 (JDT/DJF)

**DECLARATION OF DEBTOR'S  
COUNSEL IN SUPPORT OF  
MOTION TO EXTEND TIME TO  
POST-JUDGMENT DISCOVERY**

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I, Thomas F. Miller, pursuant to 28 U.S.C. § 1746, declares as follows:

1. I am an attorney licensed to practice before this court. I am over the age of 18 and make this declaration upon my personal knowledge.
2. I, Thomas F. Miller attorney for the Judgment Debtor, state under penalty of perjury that the facts set forth in the Judgment Debtor's Response to Motion to Compel are true and correct.
3. Defendant/judgment debtor requires additional time to respond to plaintiff's post-judgment interrogatories and request for production of documents on these grounds:
  - a. The scope and breadth of the discovery is overwhelming. Either motion proceedings or negotiations between counsel, will be required to rationalize them.
  - b. There has been confusion on the part of the defendant caused by the press of business and by substitution of counsel to the undersigned.
  - c. The undersigned has suffered from some health issues that have at times prevented office work. Supporting counsel has been consulted to ensure that there are no more procedural lapses.

4. I declare under penalty of perjury that pursuant to the laws of the United States of America that the foregoing is true and correct.

**THOMAS F. MILLER, P.A.**

Dated: May 6, 2024

BY /s/ Thomas F. Miller  
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